

**Nevada Division of Environmental Protection  
Chemical Accident Prevention Program  
Element Audit Checklist**



<b>Facility:</b>	<b>Process(es) Covered:</b>	<b>Date:</b>	
<b>XIIIB. EMERGENCY RESPONSE PLAN</b>			
<b>A. PROCEDURE/POLICY REVIEW</b>			
<b>1) EXISTENCE, STRUCTURE AND FORMAT OF EMERGENCY PREPAREDNESS PROGRAM</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>
If a facility WILL respond to HAZMAT incident, is an emergency response preparedness program in place pursuant to NAC 459.95442? (all requirements of section 2 must be met)		459.95442	
Notes/Comments Pertaining to Responses to Questions under Issue 1):			
<b>2) EMERGENCY PREPAREDNESS IN FACILITY PROVIDING HAZMAT RESPONSE</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>
i. Has an Emergency Action Plan (EAP) been prepared containing the elements of 29CFR1910.38a? (refer to Section 3 of this audit checklist)		459.95442(1a1)	
ii. Has a hazardous materials response program (HAZMAT Program), been developed containing the elements of 29CFR1910.120q? (refer to Section 5 of this audit checklist)		459.95442(1a2)	
iii. Have emergency responder notification procedures been developed?		459.95442(1a3)	
iv. Have public notification procedures been developed?		459.95442(1a3)	
v. Have first aid and emergency medical treatment to treat accidental human exposures been developed? (refer to Section 5 of this audit checklist)		459.95442(1a4)	
vi. Have procedures for an emergency response after a release, fire or explosion been developed? (refer to Section 5 of this audit checklist)		459.95442(1a5)	
vii. Has emergency response equipment been identified? (refer to data form)		459.95442(1a6)	
viii. Are procedures for the use, inspection, testing and maintenance in place for emergency response equipment? (refer to data form)		459.95442(1a6)	
ix. Have the training requirements related to the Emergency Action Plan in Section 3 been satisfied?		459.95442(1a7)	



x.	Have the training requirements related to the Emergency Response Plan in Section 5 been satisfied?	459.95442(1a7)	
xi.	Is a policy to review and update the ERP in place?	459.95442(1a8)	
xii.	Has the facility provided necessary information to the LEPC for inclusion in the comprehensive emergency response plan? (If not, and they are NOT obligated under 42USC11003, indicate N/A) (refer to Part B)	459.95442(1b)	
xiii.	Has the facility reviewed the EAP and HAZMAT Program with the local fire department and local HAZMAT responder? (refer to Part B)	459.95442(1c)	
xiv.	Have potential accident scenarios been reviewed with the fire department, including release, fire and explosion scenarios defined as offsite consequences under CAPP? (refer to Part B)	459.95442(1c)	
xv.	Do the local fire department and HAZMAT unit concur with the EAP and HAZMAT Program and acknowledge that they can provide the required support? (refer to Part B)	459.95442(1c)	
xvi.	Has local law enforcement been apprised of the EAP and HAZMAT Program and have they acknowledged that they can provide assistance as required? (refer to Part B)	459.95442(1c)	
xvii.	Have local medical facilities been apprised of the EAP and HAZMAT Program and have they acknowledged that they can provide treatment as required? (refer to Part B)	459.95442(1c)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 2):</b>			
<b>3) EMERGENCY ACTION PLAN (EAP), 29CFR1910.38a</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>
<b>Are the following elements, at a minimum, included in the plan?</b>		459.95442(1a1)	
i.	Emergency escape procedures and emergency escape route assignments		
ii.	Procedures to be followed by employees who remain to operate critical plant operations before they evacuate	459.95442(1a1)	
iii.	Procedures to account for all employees after emergency evacuation has been completed	459.95442(1a1)	
iv.	Rescue and medical duties for those employees who are to perform them	459.95442(1a1)	
v.	The preferred means of reporting fires and other emergencies, such as manual pull box alarms, public address systems, radio or telephones	459.95442(1a1)	
vi.	Names or regular job titles of persons or departments who can be contacted for further information or explanation of duties under the plan	459.95442(1a1)	
vii.	The types of evacuation to be used in emergency circumstances	459.95442(1a1)	



<b>Employee Alarm System</b> viii. Does the employee alarm system comply with § 1910.165? (refer to Section 4 of this audit checklist)	459.95442(1a1)	
ix. If the employee alarm system is used for alerting fire brigade members, or for other purposes, is there a distinctive signal for each purpose? (refer to Part B of this audit checklist)	459.95442(1a1)	
<b>Training Requirements</b> x. Before implementing the emergency action plan, are a sufficient number of persons designated and trained to assist in the safe and orderly emergency evacuation of employees?	459.95442(1a1)	
xi. Is the plan reviewed with each employee at the following times? (A) Whenever the employee's responsibilities or designated actions under the plan change, and (B) Whenever the plan is changed. (refer to training syllabus in data form and actual training dates in Part B versus EAP rev. date)	459.95442(1a1)	
xii. Upon initial assignment, are those parts of the plan that the employee must know in the event of an emergency, reviewed with each employee? (refer to training syllabus in data form)	459.95442(1a1)	
xiii. From review of the actual training records as recorded in Part B, is there documented evidence that the required EAP training is being conducted?	459.95442(1a1)	
<b>Emergency Action Plan Availability</b> xiv. Is the written plan kept at the workplace and made available for employee review? For those employers with 10 or fewer employees the plan may be communicated orally to employees and the employer need not maintain a written plan. (refer to Part B of this audit checklist)	459.95442(1a1)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 3):</b>   		
<b>4) EMPLOYEE ALARM SYSTEMS, 29CFR1910.165</b>	<b>NAC Ref.</b>	<b>Resp. Code</b>
<b>General Alarm Requirements</b> i. Does the employee alarm system appear to provide warning for necessary emergency action as called for in the emergency action plan, or for reaction time for safe escape of employees from the work-place or the immediate work area?	459.95442(1a1)	
ii. Is the employee alarm capable of being perceived above ambient noise or light levels by all employees in the affected portions of the work place?	459.95442(1a1)	
iii. Is the employee alarm distinctive and recognizable as a signal to evacuate the work area or to perform actions designated under the emergency action plan?	459.95442(1a1)	
iv. Does the facility post emergency telephone numbers near telephones, or employee notice boards, and other conspicuous locations when telephones serve as a means of reporting emergencies?	459.95442(1a1)	



v.	Where a communication system also serves as the employee alarm system, do all emergency messages have priority over all non-emergency messages?	459.95442(1a1)	
vi.	Have procedures been established for sounding emergency alarms in the workplace? For those facilities with 10 or fewer employees in a particular workplace, direct voice communication is an acceptable procedure for sounding the alarm provided all employees can hear the alarm. Such work-places need not have a back-up system	459.95442(1a1)	
<b>Alarm Installation and Restoration</b>		459.95442(1a1)	
vii.	Are all devices, components, combinations of devices or systems constructed and installed to comply with this standard are approved? (Steam whistles, air horns, strobe lights or similar lighting devices, or tactile devices meeting the requirements of this section are considered to meet this requirement for approval)		
viii.	Are all employee alarm systems are restored to normal operating condition as promptly as possible after each test or alarm?	459.95442(1a1)	
ix.	Are spare alarm devices and components subject to wear or destruction, available in sufficient quantities and locations for prompt restoration of the system?	459.95442(1a1)	
<b>Alarm System Maintenance and Testing</b>		459.95442(1a1)	
x.	Are all employee alarm systems are maintained in operating condition except when undergoing repairs or maintenance?		
xi.	Is a test of the reliability and adequacy of non-supervised employee alarm systems is made every two months? Is a different actuation device used in each test of a multi-actuation device system so that no individual device is used for two consecutive tests?	459.95442(1a1)	
xii.	Are power supplies maintained or replaced as often as is necessary to assure a fully operational condition? (refer to data form) Are back-up means of alarm, such as employee runners or telephones, provided when systems are out of service?	459.95442(1a1)	
xiii.	Is employee alarm circuitry installed after January 1, 1981 supervised, if it is capable of being supervised? Will it provide positive notification to assigned personnel whenever a deficiency exists in the system?	459.95442(1a1)	
xiv.	Are all supervised employee alarm systems are tested at least annually for reliability and adequacy? (refer to data form)	459.95442(1a1)	
xv.	Is the servicing, maintenance and testing of employee alarms done by persons trained in the designed operation and functions necessary for reliable and safe operation of the system?	459.95442(1a1)	
<b>Manual Operation:</b>		459.95442(1a1)	
xvi.	Are manually operated actuation devices for use in conjunction with employee alarms unobstructed, conspicuous and readily accessible?		
<b>Notes/Comments Pertaining to Responses to Questions under Issue 4):</b>			
<b>5) HAZARDOUS MATERIALS RESPONSE PROGRAM, 29CFR1910.120q (aka HAZWOPER)</b>		<b>NAC Ref.</b>	<b>Resp. Code</b>



<b>General:</b>	459.95442(1a2)	
i. Has a written emergency response plan been developed pursuant ii through xv? (Note: Select items may already be adequately covered in the Emergency Action Plan)		
<b>Does the emergency response plan address:</b>	459.95442(1a2)	
ii. Pre-emergency planning and coordination with outside parties?		
iii. Personnel roles?	459.95442(1a2)	
iv. Lines of authority?	459.95442(1a2)	
v. Training?	459.95442(1a2)	
vi. Communication?	459.95442(1a2)	
vii. Emergency recognition and prevention?	459.95442(1a2)	
viii. Safe distances and places of refuge?	459.95442(1a2)	
ix. Site security and control?	459.95442(1a2)	
x. Evacuation routes and procedures?	459.95442(1a2)	
xi. Decontamination?	459.95442(1a2)	
xii. Emergency medical treatment and first aid?	459.95442(1a2)	
xiii. Emergency alerting and response procedures?	459.95442(1a2)	
xiv. Critique of response and follow-up?	459.95442(1a2)	
xv. PPE and emergency equipment?	459.95442(1a2)	
<b>Training:</b>	459.95442(1a2)	
xvi. From review of the training syllabus in the data form and the actual training records as recorded in Part B, is the required HAZWOPER-specific training is being conducted?		
xvii. From review of the training syllabus in the data form and actual training records as recorded in Part B, is the required Annual HAZWOPER refresher training being conducted?	459.95442(1a2)	
<b>Notes/Comments Pertaining to Responses to Questions under Issue 5):</b>		



**General Records Audit/Review Notes/Comments:**



<b>B. ON-SITE INSPECTION - RECORDS AUDIT</b>				
<b>RECORDS IN FACILITY PROVIDING HAZMAT RESPONSE TO AN INCIDENT</b>				<b>Resp. Code</b>
<b>Document Availability</b>				
a.	Are Emergency Response Manual(s), or pertinent sections, located throughout the facility?			
b.	Are the available manuals, or pertinent sections, of the most recent revision?			
<b>Comments Regarding Document Availability:</b>				
<b>Training</b> Select 2 to 4 training files/records to review against actual practice (check at least one non-responder) List on the following table:				
<b>#</b>	<b>Employee ID # or Name</b>	<b>Description of Responsibility During an Emergency</b>		
i				
ii				
iii				
iv				
<b>Inquiry/Observation</b>				<b>Resp. Code :</b>
				<div style="display: flex; justify-content: space-around;"> <span>i</span> <span>ii</span> <span>iii</span> <span>iv</span> </div>
<b>Required Training Topics (Y - indicates documented training &amp; passing score on test, refer to training syllabus for specific classes)</b>				
a.	Hazard and emergency recognition			
b.	Emergency Action Plan			
<b>Duty-Specific Training Topics (Y - indicates documented training &amp; passing score on test or certificate, refer to training syllabus for specific classes)</b>				
c.	Rescue or Medical Training			
d.	Emergency Plant Operation Procedures (such as shutdown during or after evacuation)			
<b>HAZWOPER-Specific Training Topics (Y - indicates documented training &amp; passing score on test or certificate, refer to training syllabus for specific classes)</b>				
e.	Emergency Response Plan			



f.	First Responder, Awareness Level				
g.	First Responder, Operations Level				
h.	HAZMAT Technician				
i.	HAZMAT Specialist				
j.	Incident Commander				
k.	HAZMAT Trainer				
l.	PPE Training and Certification				
<b>Record of Medical Surveillance</b>					
m.	If the employee's response role includes donning PPE, is there a record of Medical Surveillance?				
<b>Completeness of Training and Comprehension Verification</b>					
n.	Does the training compliment the employee's responsibility during an emergency?				
<b>Comments Regarding Training:</b>					







Emergency Response Critique
<p><b>If drills or actual emergency responses have been conducted, select one or more and address the following:</b></p> <ol style="list-style-type: none"><li><b>1. Provide a brief description of the event.</b></li><li><b>2. Note if the response was critiqued and provide a brief description of the findings.</b></li><li><b>3. Provide a brief description of recommendations from the critique and note if they have been implemented.</b></li></ol>
Event No. 1:
Event No. 2:
Event No. 3:
Event No. 4:



## Only Complete for Incidents Involving a Hazardous Substance Release

### Review of Procedures for Handling Emergency Response

Select at least one of the Events Listed Above and Determine if Procedures for Handling Emergency Response were Followed Pursuant to 29 CFR 120q (3)&(4)

#	Event Number	Event Description
i		
ii		
iii		
iv		

  

Inquiry/Observation	Resp. Code :			
	i	ii	iii	iv
<b>Requirements per 120q (3)&amp;(4) (Y – indicates documented evidence or affirmative response from personnel in the incident command structure)</b>				
a. Were all emergency responders and their communications coordinated and controlled through the incident commander?				
b. Did the incident commander identify all hazardous substances or conditions present and consider, use of engineering controls, maximum exposure limits, hazardous substance handling procedures, and use of any new technologies?				
c. Did the incident commander assure that the personal protective equipment worn was appropriate for the hazards encountered?				
d. Did employees engaged in the emergency response that were exposed to hazardous substances presenting an inhalation hazard wear positive pressure self-contained breathing apparatus while engaged in emergency response? (Note: Not required when the incident commander determines through the use of air monitoring that a decreased level of respiratory protection will not result in hazardous exposures.)				
e. Did the incident commander limit the number of emergency response personnel in those areas of potential or actual exposure to incident or site hazards, to those who are actively performing emergency operations?				
f. Were operations in hazardous areas performed using the buddy system in groups of two or more?				
g. Were back-up personnel standing by with equipment ready to provide assistance or rescue?				
h. Were advance first aid support personnel standing by with medical equipment and transportation capability?				
i. Did the incident commander designate a safety official, who is knowledgeable in the operations being implemented at the emergency response site?				
j. If the safety official determined that there was an IDLH condition or the activity involved an imminent danger, were they able to alter, suspend, or terminate those activities?				
k. Did the incident commander implement appropriate decontamination procedures?				

<p>l. If personnel, who are skilled in the operation of certain equipment such as mechanized heavy equipment, were needed temporarily to perform immediate emergency support work AND there was a potential to be exposed to the hazards at an emergency response scene:</p> <ul style="list-style-type: none"> <li>- Were they briefed on the hazards and on the donning of PPE; and</li> <li>- Were they provided the PPE?</li> </ul>				
<p>m. Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards, and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident,</p> <p>If the facility needed to remove hazardous substances or contaminated materials after the emergency response, did the cleanup comply with one of the following:</p> <ul style="list-style-type: none"> <li>(i) Paragraphs (b) through (o) of 29CFR1910.120; or</li> <li>(ii) Where the clean up was done on plant property using plant or workplace employees, were the employees trained in 29 CFR 1910.38(a); 1910.134; 1910.1200, and other appropriate safety and health training?</li> </ul>				
<p><b>Comments Regarding Emergency Response Critique:</b></p>				



**General On-Site Inspection Notes/Comments:**



<b>C. INTERVIEWS</b>	
<b>SELECT TWO OR MORE OPERATING PERSONNEL TO INTERVIEW REGARDING THE EFFECTIVENESS OF THE EAP/ERP USING THE FOLLOWING QUESTION SETS.</b> (RESPONSES ARE TO BE LOGGED ON FOLLOWING PAGES.)	
<b>Question Set</b>	<b>Question Options/Phrasing</b>
<b>a</b>	What is your job description and associated tasks?
<b>b</b>	Are you aware or knowledgeable of the facility Emergency Action Plan or Emergency Action Plan? Is a copy of the EAP/ERP readily accessible? Is the copy of the EAP/ERP legible or does it need to be replaced with a new copy? Do you keep copies of pertinent sections of the plan posted or handy for routine review or reference?
<b>c</b>	How would you identify a hazardous substance release? What actions would you take to notify others of an emergency situation you witnessed? How would you be notified or become aware of a fire or hazardous substance release in your process area? How would you be notified or become aware of a fire or hazardous substance release elsewhere in the facility?
<b>d</b>	What are you to take if you are notified of a hazardous substance release or leak? What is the designated route of evacuation from your normal work place? Where are you supposed to go for an assembly point after an evacuation?
<b>e</b>	What training or review have you been given in the EAP/ERP? Have you been involved in evacuation drills? Have you been involved in emergency response drills? How did the drill(s) go? Do you feel that the training was adequate in this area (i.e. instruction and materials understandable, everything appeared to be covered)? Suggested improvements?
<b>f</b>	Do you have any special duties to perform prior to an evacuation, such as performing an emergency shutdown of process equipment? What do these duties entail?
<b>g</b>	What level of HAZMAT training have you undergone? Are you a member of the facility HAZMAT or Emergency Response Team?
<b>h</b>	How often do you or your department or workgroup review pertinent EAP/ERP actions? How do you submit suggested changes or improvements to the EAP/ERP?



<b>C. INTERVIEWS</b>			
<b>RECORD RESPONSES OF SELECTED OPERATING OR MAINTENANCE PERSONNEL TO QUESTIONS FROM THE QUESTION SETS (LISTED ON THE FIRST PAGE OF SECTION C)</b>			
<b>Employee Profile</b>			
<b>Job Title/Position</b>	<b>Department/Unit/Group</b>	<b>Yrs in Job</b>	<b>Yrs w/Co.</b>
<b>Response to Question Set _:</b>			
<b>Response to Question Set _:</b>			
<b>Response to Question Set _:</b>			
<b>Response to Question Set _:</b>			